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July 21, 2021

**VIA ECF**

The Honorable Debra Freeman  
United States Magistrate Judge  
U.S. District Court Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 17A  
New York, New York 10007

Re: **In re Methyl Tertiary Butyl Ether (MTBE) Products Liability Litigation, MDL 1358  
Commonwealth of Pennsylvania v. Exxon Mobil Corp., et al.,  
Case No. 1:14-cv-06228**  
**Re: Discovery schedule relating to ECF 624**

Dear Judge Freeman:

Following the conference with the Court on 6/16/2021, the parties met and conferred and agreed upon the following schedule with respect to the Commonwealth's Revised Responses to Requests for Admission Regarding Air Quality and Ethanol which was the subject of ECF 624, subject to the Court's approval:

- July 26: Plaintiff to revise its responses to the Air Quality RFAs consistent with the direction provided by the Court at the hearing on 6/16.
- July 28-August 4: Parties to meet and confer regarding issues in plaintiff's revised responses, if any.
- August 6: Defendants to propound follow-on discovery and/or file further motion to compel after a meaningful meet and confer on outstanding issues (if any).
- August 20: Plaintiff to file opposition to further motion to compel (if any).

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- September 3: Plaintiff to respond to defendants' follow-on discovery and Defendants to serve reply in support of any further motion to compel.

Respectfully submitted,

*s/ Molly McGinley Han*

Molly McGinley Han

Cc: All Counsel of Record (via FSX)